

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) BRIAN THOMPSON, individually;	)	
(2) JENNIFER JAMES, individually,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. CV-23-1074-R
	)	
(1) J. GRAY TEEKELL, individually;	)	
(2) THE TEEKELL COMPANY, INC.; and	)	
(3) MICHAEL E. KRASNOW, Trustee of	)	
Morton Family Irrevocable Trust,	)	
	)	
Defendants.	)	

**UNOPPOSED MOTION OF DEFENDANT MICHAEL E. KRASNOW  
FOR EXTENSION OF TIME TO RESPOND TO  
PLAINTIFFS' SECOND AMENDED COMPLAINT**

Defendant, Michael E. Krasnow ("Krasnow"), pursuant to LCvR 7.1(h), respectfully requests the Court to extend the time in which he may file a Response to Plaintiffs' Second Amended Complaint [Doc. No. 20] until April 19, 2024. In support of this Motion, Krasnow shows the Court as follows:

1. Plaintiffs filed their Second Amended Complaint [Doc. No. 20] on March 26, 2024.
2. Without the extension of time requested herein, Krasnow's response to Plaintiffs' Second Amended Complaint would be due on or before April 9, 2024.
3. The additional time requested is needed to prepare an adequate response to Plaintiffs' Second Amended Complaint.
4. Krasnow has made no previous request for an extension of time to file a pleading responsive to Plaintiffs' Second Amended Complaint.

5. Counsel for Krasnow is authorized to state that Plaintiffs do not oppose the relief sought in this Motion.

6. This Motion is made in good faith and without the intention to hinder or delay the proceedings. No Scheduling Order has been entered in this proceeding, and the grant of this Motion will not impact other deadlines.

7. Krasnow has submitted an Order granting the relief requested herein for entry by the Court.

WHEREFORE, Defendant Michael E. Krasnow respectfully requests the Court to enter an Order extending the deadline within which he may file a responsive pleading to Plaintiffs' Second Amended Petition until April 19, 2024.

Respectfully submitted,

s/ Kurt M. Rupert

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*Attorneys for Defendant,*

*Michael E. Krasnow as Trustee of the Morton*

*Family Irrevocable Trust*

### CERTIFICATE OF SERVICE

I hereby certify that on April 5, 2024 I electronically transmitted the foregoing document to the Clerk of the Court for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electric Filing to the following ECF Registrants:

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/s/ Kurt M. Rupert  
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